

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

UNION ASSET MANAGEMENT HOLDING)	Case No. 1:19-cv-01339
AG AND SJUNDE AP-FONDEN,)	
Individually and on Behalf of All Others)	ECF Case
Similarly Situated,)	
	Honorable Robert M. Dow, Jr.
Plaintiffs,)	
)
v.))
THE KRAFT HEINZ COMPANY, et al.,))
)
Defendant.))
)

RICHARD MERRITTS, derivatively on behalf)	Case No. 1:20-cv-02071
of THE KRAFT HEINZ COMPANY,)	
)
Plaintiff,)	Honorable Martha M. Pacold
)
vs.))
3G CAPITAL, INC., et al.,))
)
Defendants.))
)
– and –))
THE KRAFT HEINZ COMPANY,))
)
Nominal Defendant.))
)

[Caption continued on following page.]

**PLAINTIFF STEPHEN SILVERMAN'S MOTION TO REASSIGN AND
CONSOLIDATE RELATED ACTIONS AND TO APPOINT
LEAD PLAINTIFF AND LEAD COUNSEL**

DALE WATERS, Derivatively on Behalf of)	Case No. 1:20-cv-02072
Nominal Defendant THE KRAFT HEINZ)	
COMPANY,)	Honorable Harry D. Leinenweber
)	
Plaintiff,)	
)	
vs.)	
)	
ALEXANDER BEHRING, et al.,)	
)	
Defendants.)	
)	
– and –)	
)	
THE KRAFT HEINZ COMPANY,)	
)	
Nominal Defendant.)	
)	
—————)	
In re KRAFT HEINZ SHAREHOLDER)	Case No. 1:20-cv-02259
DERIVATIVE LITIGATION)	
)	Honorable Virginia M. Kendall
—————)	
STEVEN HILL, Derivatively on Behalf of)	Case No. 1:20-cv-02280
THE KRAFT HEINZ COMPANY,)	
)	
Plaintiff,)	
)	
vs.)	
)	
GREGORY E. ABEL, et al.,)	
)	
Defendants.)	
)	
– and –)	
)	
THE KRAFT HEINZ COMPANY,)	
)	
Nominal Defendant.)	
)	
—————)	

Plaintiff Stephen Silverman in the above-captioned *In re Kraft Heinz S'holder Derivative Litig.*, No. 1:20-cv-02259 (N.D. Ill.), together with plaintiffs Vladimir Gusinsky Revocable Trust, Charlotte Hays, Ian Green and Steven Hill, by and through their undersigned counsel, respectfully move this Court for an Order: (1) finding the cases of *In re Kraft Heinz S'holder Deriv. Litig.*, 1:20-cv-02259 (N.D. Ill.) and *Hill v. Abel, et al.*, 1:20-cv-02280 (N.D. Ill.) (the “Related Cases”) are related to *In re Kraft Heinz Sec. Litig.*, No. 1:19-cv-01339, pending before this Court, and reassigning the Related Cases to this Court’s calendar pursuant to Local Rule 40.4; (2) consolidating the Related Cases with *Merritts v. 3G Capital, Inc., et al.*, 1:20-cv-02071 (N.D. Ill.) and *Waters v. Behring, et al.*, 1:20-cv-02072 (N.D. Ill.) (collectively, the “Derivative Cases”) pursuant to Federal Rule of Civil Procedure 42(a); (3) appointing Stephen Silverman as Lead Plaintiff; and (4) appointing Robbins Geller Rudman & Dowd LLP as Lead Counsel (the “Motion”). The Motion is based on the accompanying memorandum in support of the Motion, the exhibits attached thereto, the argument of counsel, if any, and such additional matters as the Court may properly consider in connection with the Motion.

DATED: April 17, 2020

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on April 17, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Frank A. Richter

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